

# Exhibit 1

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 11-CIV-62424-SCOLA**

CHRISTINA ULBRICH, as an individual and as a  
Representative of the classes,

Plaintiff,

v.

GMAC MORTGAGE, LLC, formerly known as  
GMAC MORTGAGE CORPORATION, and  
BALBOA INSURANCE SERVICES, INC.

Defendants.

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**DECLARATION OF JOHN DICKSON**

I, JOHN A. DICKSON, declare:

1. I was a Senior Vice President for Balboa Insurance Services, Inc. ("BIS") from 2007 to 2011. My responsibilities included Program Administration. I am currently an employee of QBE Americas, Inc., performing work for QBE FIRST Insurance Agency, and my title is Vice President, New Product Development.
2. On each lender-placed windstorm policy that BIS procured for GMAC, BIS earned a commission.
3. BIS' predecessor entity, Countrywide Insurance Services, Inc. ("CIS") procured lender-placed windstorm insurance for GMAC. The policies procured for GMAC by CIS had coverage effective start dates from September 15, 2007 until October 2009.
4. Seattle Specialty Insurance Services ("SSIS") took over the business function formerly served by CIS and BIS following the acquisition by QBE Holdings of substantially all of the assets of Balboa Insurance Company and its affiliates on Jun 1, 2011.
5. CIS, BIS, and SSIS procured lender-placed windstorm coverage for GMAC during these periods pursuant to contracts with Newport Management Corporation ("NMC"). On each lender-placed windstorm policy, NMC also earned a commission.

6. I have personal knowledge of the facts stated herein and, if asked to do so, I could and would competently testify thereto.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 19<sup>th</sup> day of November, 2012.

A handwritten signature in black ink, appearing to read "John A. Dickson", is written over a horizontal line.

John A. Dickson